

## United States District Court

SEP 11 2019

SOUTHERN

DISTRICT OF

TEXAS

MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Monica Lizet Romero

Principal

United States

Case Number:

YOB: 1987

M-19-2200 -M

Rubi Romero

Co-Principal

United States

YOB: 1990

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 10, 2019 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jesusita Reyes-Vasquez and Luis Alberto Rubio-Rubio, both citizens of Mexico, along with one (1) other undocumented alien, for a total of three (3), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to-wit: a residence located in Roma, Texas

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)  
I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On September 10, 2019, Border Patrol Agents received a request for assistance from Escobares Police Department in regards to a residence possibly being utilized to harbor undocumented aliens in Roma, Texas.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by Robert Guerra HUS4

Sworn to before me and subscribed in my presence,

September 11, 2019

Date

4:13 pm

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Complainant

Nicolas L. Burgos Border Patrol Agent

Printed Name of Complainant

at McAllen, Texas  
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19-2200-M**

**RE: Monica Lizet Romero  
Rubi Romero**

**CONTINUATION:**

Agents responded and arrived at the residence located in Roma, Texas. Officer Garza with the Escobares Police Department advised that they received a phone call regarding suspected aliens being dropped off at the residence. Officer Garza claimed contact was made with the home owner later identified as Rubi Romero, a United States Citizen. Officer Garza advised Romero of the information regarding illegal aliens at her house to which Romero provided verbal consent to enter the residence. Officer Garza claimed they encountered three suspected undocumented aliens inside a bedroom along with a female subject later identified as Monica Lizet Romero, a United States Citizen.

Agents conducted an immigration inspection on all three subjects and determined that they were illegally present in the United States.

Agents proceeded to interview Rubi Romero and read her Miranda Rights. Rubi Romero freely admitted to harboring the illegal aliens and stated her sister-in-law Monica Lizet Romero picked up the aliens and brought them to her residence.

All subjects were transported to the Rio Grande City Border Patrol Station to be processed accordingly.

**PRINCIPAL STATEMENT:**

Monica Lizet Romero was read her Miranda Rights. She understood and agreed to provide a sworn statement without the presence of an attorney.

Romero claimed she was visiting her sister in law's house and saw the people there. Romero claims that her sister in law told her that a gray car dropped the people off. Romero denied any involvement in human smuggling.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19-2200 -M**

**RE: Monica Lizet Romero  
Rubi Romero**

**CONTINUATION:**

**CO-PRINCIPAL STATEMENT:**

Rubi Romero was read her Miranda Rights. She understood and agreed to provide a sworn statement without the presence of an attorney.

Romero claimed that she received a call from a human smuggler to offer her \$100 to "scout" for law enforcement while her sister-in-law Monica Romero picked up illegal immigrants near the Rio Grande River. Romero stated that she was in a three way call with the smuggler and Monica while the smuggler walked the group to where Monica was to pick them up. Romero stated that while on the phone she heard when the subjects boarded Monica's vehicle. Romero stated that while on the phone the smuggler offered her \$70 per person if she harbored the illegal aliens in her house to which she agreed.

Rubi Romero stated that when she arrived to her house, the illegal aliens were getting off Monica's vehicle and walking into her house. Romero stated that once the three subjects were inside her property she instructed them to go into one of the bedrooms.

Rubi Romero identified Monica Lizet Romero, through a photo lineup, as the person that picked up the illegal aliens.

**MATERIAL WITNESSES STATEMENTS:**

Jesucita Vasquez-Reyes and Luis Alberto Rubio-Rubio were read their Miranda Rights. Both understood and agreed to provide a sworn statement without the presence of an attorney.

Vasquez, a citizen of Mexico, stated that a friend made her smuggling arrangements and paid \$1,500 upfront. Vasquez stated that she crossed the river in a raft with three other subjects. Vasquez stated that after walking they arrived to a road where a black truck was waiting for them and that a female driver signaled with the hands to get in the vehicle. Once in the vehicle, Vasquez stated that the female drove to a house and instructed them to go inside. Vasquez stated that once in the house another female in the residence offered them food and water.

Vasquez identified Monica Lizet Romero, through a photo lineup, as the driver of the vehicle.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19-2200-M**

**RE: Monica Lizet Romero  
Rubi Romero**

**CONTINUATION:**

Vasquez identified Rubi Romero, through a photo lineup, as the female subject who offered them food and water.

Rubio, a citizen of Mexico, stated he made the smuggling arrangements and paid 14,000 pesos upfront. After crossing the river along with two other people, Rubio stated they were told a black vehicle was going to pick them up. Once they reached the pickup location, Rubio stated the vehicle was already there. Rubio claimed he board the vehicle and noticed the driver was a female subject. Rubio stated the female subject transported them to a house and once there, the female driver instructed them to go inside a room. At the house, Rubio claimed there was another female subject who offered them water.

Rubio identified Monica Lizet Romero, through a photo lineup, as the driver of the vehicle.

Rubio identified Rubi Romero, through a photo lineup, as the female subject who offered them water.